

Attachment A
Plaintiffs' Responses to Defendants' Objections
Designations for 1/17/2019 Deposition of Gary Boggs

Mr. Boggs worked at the DEA from 1985 until 2012. *See* 1/17/2019 deposition of Gary Boggs (“dep.”) at 20:7-14. He was a DEA Special Agent until 1999, when he became a Group Supervisor, which is a position he held until 2003 when he was promoted to Unit Chief. Then, from 2006 to 2012 he was the Executive Assistant in the Office of Diversion Control. *Id.* at 20:21-21:23. His responsibilities as Executive Assistant included “the implementation of the regulatory aspect of the Controlled Substances Act, overseeing the DEA registrants that were authorized to handle controlled substances.” *Id.* at 22:8-15. This included overseeing wholesale distributors like Defendants. *Id.* at 22:16-18. Additionally, Mr. Boggs publicly presented the positions of the DEA with respect to maintaining appropriate obligations under the Controlled Substances Act and the obligations of wholesale distributors to maintain appropriate legal obligations with respect to avoiding the diversion of controlled substances. *Id.* at 31:2-15.

As of 2019, Mr. Boggs was the VP of Regulatory Affairs and Compliance at McKesson. *See* dep. at 18:8-11. His job responsibilities included, “overseeing the controlled substance monitoring program at McKesson for the independent small, medium chain pharmacies, hospitals, veterans, government accounts, and overseeing a team that implements that program across the United States.” *Id.* at 18:14-22. His prior role at McKesson, which he was in for the prior 5 years, was Senior Director of Regulatory affairs for the East region of the U.S., where he held the same responsibilities for the eastern half of the U.S. *Id.* at 19:5-19. For the entire 5+ years he has worked at McKesson, his responsibilities included ensuring that McKesson complied with the federal laws and regulations which exist in an effort to prevent diversion of controlled substances. *Id.* at 19:21-20:5. Also, as part of his work at McKesson, Mr. Boggs evaluated McKesson’s prior order monitoring programs to see how improvements could be made. *Id.* at 172:23-173:3.